

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

SHYKEMMIA CONE,

Plaintiff,

v.

**SINGH SOBATPREET, 2111606
ALBERTA LTD. d/b/a
TRANSKING TRUCKING and
INTACT FINANCIAL
CORPORATION,**

Defendants.

CIVIL ACTION FILE NO.

**BIBB STATE COURT
CIVIL ACTION FILE NO.
21-SCCV-093228**

**DEFENDANTS SOBATPREET SINGH, 2111606 ALBERTA LTD D/B/A
TRANSKING TRUCKING, AND INTACT FINANCIAL
CORPORATION'S NOTICE OF REMOVAL TO UNITED STATES
DISTRICT COURT**

TO: The Honorable Judges of the United States District Court for the Middle District
of Georgia, Macon Division:

COMES NOW, DEFENDANTS SOBATPREET SINGH, 2111606
ALBERTA LTD D/B/A TRANSKING TRUCKING, AND INTACT FINANCIAL
CORPORATION (hereinafter "Defendants"), and file the following Notice of
Removal to United States District Court, showing the Court as follows:

1. This civil action was filed on or about August 15, 2021 in the State Court of Bibb County, State of Georgia. That action is designated there as Civil Action File No.: 21-SCCV-093228. Defendants acknowledged service on September 16, 2021. This notice of removal is timely filed.

2. Defendant files herewith a copy of all process, pleadings, and orders received by Defendant in Civil Action File No.: 21-SCCV-093228, pursuant to 28 USC §1446.

3. Defendant Sobatpreet Singh (incorrectly identified as Singh Sobatpreet), is now, was at the commencement of Civil Action File No.: 21-SCCV-093228, and at all times since a citizen of and resident of Windsor, Ontario, Canada. (Compl. ¶ 1). Mr. Sobatpreet acknowledged service on September 16, 2021.

4. Defendant 2111606 Alberta LTD d/b/a Transking Trucking was incorporated in Calgary, Alberta, Canada and had its principal office at the time of filing of Civil Action File No.: 21-SCCV-093228, and at all times since has been located in Alberta, Canada. (Compl. ¶ 2). Transking Trucking acknowledged service on September 16, 2021.

5. Defendant Intact Financial Corporation was at the commencement of Civil Action File No.: 21-SCCV-093228, and at all times since has been an entity

organized and existing under the laws of and with its principal place of business in Ontario, Canada. The State Court of Bibb County Granted the parties' Consent Motion on September 22, 2021, in which Intact Financial Corporation acknowledged service.

6. Upon information and belief, Plaintiff is an individual residing in the State of Georgia.

7. The action described above is a civil action with a claim of which this Court has original jurisdiction, and it is one that may be removed to this Court by the Defendants pursuant to the provisions of 28 USC §§ 1332 and 1441 et seq., in that there is complete diversity among the Parties, the Parties are not residents of the same State, and Plaintiff has alleged an amount in excess of \$75,000.00, therefore the amount in controversy exceeds \$75,000.00 exclusive of interest and costs. (Compl. ¶ 13).

8. Defendants attach hereto a copy of the Summons and Complaint in State Court of Bibb County, State of Georgia, marked as Exhibit “A”.

9. Defendants attach hereto a copy of Defendants' Notice of Removal which has been sent for filing in the State Court of Bibb County, State of Georgia, marked as Exhibit “B”.

11. All served Defendants agree to this removal.

WHEREFORE the Defendants pray that the above action now pending against them in the State Court of Bibb County, State of Georgia, be removed to this Court.

Respectfully submitted this 28th day of September, 2021.

HALL BOOTH SMITH, P.C.

/s/ Sean B. Cox

SEAN B. COX

Georgia State Bar No. 664108

Attorneys for Defendants

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DEFENDANT DEMANDS

TRIAL BY JURY

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Defendants.

CIVIL ACTION FILE NO.

**CARROLL STATE COURT
CIVIL ACTION FILE NO.
21-SCCV-093228**

CERTIFICATE OF SERVICE

I hereby certify that on this day I have served a copy of the within and foregoing **DEFENDANTS' NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT** upon all parties to this matter by depositing same in the U.S. Mail, proper postage prepaid, addressed to counsel of record and/or filing said document electronically which will automatically send electronic notification to the following:

David Dozier
Sean G. Hickey
Dozier Law Firm LLC
327 Third Street
PO Box 13
Macon, GA 31202-0013
david@dozierlaw.com
shickey@dozierlaw.com

This 28 day of September, 2021.

HALL BOOTH SMITH, P.C.

/s/ Sean B. Cox
SEAN B. COX
Georgia Bar No. 664108
Counsel for Defendants

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